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OCT 28 2008

Public Disclosure
Commission

**Formal Complaint to the Washington State Public Disclosure Commission
Relating to an Elected Official or Candidate for Public Office**

Name of Official or Candidate: DINO ROSSI / ROB MCKENNA / DOUG SUTHERLAND

Address of Official or Candidate: SEE BELOW

Official's or Candidate's _____
City State Zip Code

Official's or Candidate's Telephone: (425) 498-2008 / (206) 232-0070 / (360) 628-8372
(Include Area Code)

Official's or Candidate's E-Mail Address: info@dinarossi.com / campaign@robmckenna.org / doug@
(If known) dougsutherland.org

Your signature: [Signature]

Your printed name: DWIGHT PELZ

Street address: 615 2ND AV RN 580

City, state and zip code: SEATTLE WA 98104

Telephone number: 206 583 0664

E-Mail Address: (Optional) DWIGHT@WA-DEMOCRATS.ORG

Date Signed: 10/23/08

Place Signed (City and County): SEATTLE KING
City County

Complaint: (Attach Complaint and Certification)

* ROSSI: P.O. Box 52908, Bellevue, WA 98015

MCKENNA: 7605 SE 27TH St. #205, Mercer Island, WA 98040

SUTHERLAND: P.O. Box 2375, Olympia, WA 98507

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**Certification for a
Complaint to the Washington State Public Disclosure Commission Relating to an
Elected Official or Candidate for Public Office
(Notary Not Required)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington
that the facts set forth in this attached complaint are true and correct.

Your signature: [Signature]

Your printed name: DWIGHT PELZ

Street address: 190 615 2ND AV RM 580

City, state and zip code: SEATTLE WA 98104

Telephone number: 206 583 0664

E-Mail Address: (Optional) DWIGHT@WA-DEMOCRATS.ORG

Date Signed: 10/23/08

Place Signed (City and County): SEATTLE KING

City

County

*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement,
which he knows to be false, under an oath required or authorized by law. (2) False swearing is a
misdemeanor."

COMPLAINT ATTACHED

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October 23, 2008

Phil Stutzman
Director of Compliance
PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY #206
PO BOX 40908
OLYMPIA, WA 98504-0908

RE: Investigation of improper campaign contributions from Media Plus+, Inc.

Dear Mr. Stutzman,

I am writing to request that the Public Disclosure Commission ("PDC") investigate – and bring appropriate action to stop – the business practices of Media Plus+, Inc. ("Media Plus"), a media buyer that reportedly purchases television time "on credit" for its political clients. This practice may constitute a reportable campaign contribution from Media Plus to its political candidates, and, as such, would be subject to campaign contribution limits. An investigation and immediate action, including enjoining any further violations, is necessary.

According to PDC reports, Media Plus has been hired as the media buyer for Republican candidates in Washington state – including Dino Rossi, the Republican candidate for Governor; Rob McKenna, the Republican candidate for Attorney General; and Douglass Sutherland, the Republican candidate for Commissioner of Public Lands. PDC reports indicate that Media Plus has arranged to purchase hundreds of thousands of dollars of television and radio advertising for Mr. Rossi, Mr. McKenna, and Mr. Sutherland. As such, these candidates may be the beneficiaries of an unprecedented "on credit" arrangement fostered by Media Plus with local stations. None of the candidates has reported any contributions from Media Plus.

As you may be aware, the customary practice in political advertising is for up-front payment of media time. By extending its own line of credit with television and radio stations to campaigns, Media Plus could provide to its political clients an unmistakable advantage, relieving them of the requirement to "purchase" media time and giving them an advantage at the most crucial part of the campaign season.

According to recent media reports, which focus on Media Plus's work for Congressional candidate Dave Reichert, the firm has bought television advertising on credit during this election cycle:

KOMO-TV sold Reichert's ad buyer, Media Plus+, the most recent TV slots on credit — a practice that is relatively uncommon for political advertising. KIRO-TV also extended credit for Reichert ads that are running this week, said Burner spokesman Sandeep Kaushik.

Most political campaigns pay for their ads upfront, but KOMO vice president and general manager Jim Clayton said the station sometimes bills buyers it has a good relationship

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with. He said KOMO regularly works with Media Plus+ and that the agency would be on the hook for the ad buy if the Reichert campaign doesn't pay. (Seattle Times, 10/21/08)

We have confirmed that Mr. Rossi's advertisements are given the same treatment at KIRO-TV and KING-5. Furthermore, Kathy Neukirchen of Media Plus recently confirmed to a reporter that this credit arrangement is available to all of its political clients:

Her firm gets its TV time for all its clients, political and commercial, on credit. Media Plus is a big local buyer and has an established relationship with the stations. She pays for the time at the end of the month (the practice is called "Net 30"). Her political clients are treated no differently, she says, than her commercial clients. (HA Seattle, 10/21/08)

Given that Media Plus clients include candidates running for office in the state of Washington, it is imperative to determine whether this extension of credit constitutes a reportable campaign contribution. We believe it does. Under Washington state law, "contribution" is defined as:

- (i) **A loan**, gift, deposit, subscription, forgiveness of indebtedness, donation, **advance**, pledge, payment, transfer of funds between political committees, or **anything of value**, including personal and professional services for less than full consideration;
- (ii) An expenditure made by a person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a political committee, the person or persons named on the candidate's or committee's registration form who direct expenditures on behalf of the candidate or committee, or their agents;
- (iii) **The financing** by a person of the dissemination, distribution, or republication, **in whole or in part, of broadcast, written, graphic, or other form of political advertising** or electioneering communication prepared by a candidate, a political committee, or its authorized agent. . . (RCW 42.17.020(15)(a), emphasis added)

The purchase by Media Plus of media time "on credit" would relieve its clients of the obligation to pay for that advertising, which constitutes a loan or financing of political advertising under state law. Such contributions must be reported and cannot exceed well-established contribution limits.

I respectfully request that you investigate these potentially serious campaign finance violations and take immediate action. Please do not hesitate to contact me at (206) 583-0664 if I can be of further assistance.

Sincerely,



Dwight Pelz
Chairman, Washington State Democratic Party